

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

FRANK TIMOTHY BRUCE,)	
)	
PLAINTIFF,)	
)	
vs.)	Case No. 17-03073-CV-SRB
)	
BRAD COLE, et al.,)	
)	
DEFENDANTS.)	

PLAINTIFF’S MOTION FOR AN EXTENSION OF TIME

COMES NOW Plaintiff, by and through his attorney of record, and respectfully submits his motion for an extension of time in which to submit his responses to Defendants’ pending motions. In support of this motion, Plaintiff offers his suggestions.

SUGGESTIONS IN SUPPORT

1. Responses to the following motions are currently on April 18, 2018:
 - a. Document 34 – Defendants Christian County, Weter, Bilyeu and Phillips’ Motion for Partial Judgment on the Pleadings.
 - b. Document 36 – Defendants Weter, Bilyeu and Phillips’ Motion for Partial Judgment on the Pleadings.
 - c. Document 37 - Defendants Christian County, Weter, Bilyeu and Phillips’ Motion for Summary Judgment.
2. The motions by these separate Defendants raise similar issues.
3. Due to the similarity in the issues presented, Plaintiff believes that it is more efficient to respond to all of these pending motions at the same time.

4. Additionally, Plaintiff propounded discovery requests prior to the filing of these motions. Responses to these requests have yet to be fully made. Counsel for both parties discussed these responses on Tuesday, April 17th, and Counsel for Defendants believes that these responses are very close to being finalized. However, at this time, Defendants' responses are not complete. Plaintiff believes that these responses may be relevant to Plaintiff's responses to the pending motions.
5. Plaintiff seeks an additional seven (7) days from today's date to file his response to these pending motions.
6. Counsel for Defendants has been contacted regarding this motion for an extension of time and was not immediately available. However, based on prior conversations, Plaintiff believes that Defendants will not oppose the granting of this motion.
7. Plaintiff submits that this Motion is being made in the interest of justice and that no prejudice will exist to either party if this motion is granted.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order granting Plaintiff seven (7) additional days up to and including April 25, 2018, in which to submit his response to Defendants' pending motions and to enter such other orders as the Court deems just and appropriate in this matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was filed electronically on this 18th day of April, 2018, to the following persons:

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